

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

BURDLEY JEAN, et al.

CRIMINAL NO. 05-10110-MLW

UNITED STATES' PROPOSED VOIR DIRE QUESTIONS

In addition to the Court's customary introduction to the jury, the United States requests that the Court ask prospective jurors the following voir dire questions:

1. Have you, a family member, or someone close to you ever been involved in a criminal case as either a victim, a witness, or a person charged with a crime?
2. Are you, a family member, or someone close to you involved in the criminal justice system as a prosecutor, a defense attorney, or an employee of either a prosecutor or a defense attorney?
3. Are you, a family member, or someone close to you employed by any law enforcement agency?
4. Are you, a family member, or someone close to you employed in any aspect of the business of banking?
5. This case involves charges that the defendants conspired to commit bank fraud and charges that the defendants did in fact commit bank by cashing counterfeit checks at various banks in Massachusetts. Have you read or heard anything about this matter?
6. The indictment alleges that counterfeit checks were cashed at several banks and that one or more defendants sought access to account information of several companies with accounts at those banks. Are you, a family member, or someone close to you employed by any

of the following businesses: Bank of America; Sovereign Bank; Citizens Bank; Perini Corporation; Digiorgio Associates, Inc.; Law Office of Scott Scheiderman; EMC Corporation; Steffian Bradley Architects; Mohawk Village Motors, Inc.; David King and Company, Inc.; Disability Management Services, Inc; Mosiki Development, Inc.; Advanced Wireless Automation, Inc.; Fleet Bank; Commonwealth Cooperative Bank; Jewish Community Relations Council of Greater Boston; Full Armor Corporation; Julian Crane & Equipment Corporation; Eagle Investment Systems Corporation; Westbank Realty Corp.; Corporate Realty Group, Inc.; Atlantic Power & Light Company; Hillside Resource and Management; Pohly & Partners, Inc.; Mason and Martin LLP; Wellesley Companies, Inc.; Starr Realty; Crown Colony Owners Association; Westray Realty Company, LLC; Chanel, Inc.; Fenway Community Health Center; Real Estate Realty; Realty Association Fund III; Abbey Landmark Operating LLC, Americana; Pratt Ophthalmology Associates; Red Star Contracting, Inc.; Sid Wainer and Son Friendly Fruit; Suffolk Construction Co., Inc.; Tata & Howard, Inc.; Global Consult of New Jersey; Global Consulting Group; Global Consulting Group, Inc.; Global Consulting Partners; Global Consulting Resources I; Global Consulting; Global Consulting Specialists; Global Consulting Service; Global Consulting Services, and Global Consulting of Reston I; Dorchester Real Estate, Inc.; N & W Realty, Inc.; Realty Partners; Realty Partners Group; Realty Partners NE II; Realty Partnership; Realty Plus; Realty Production LLC; Westgate Recruiting LLC; Westbank Realty Corporation; Pembroke Realty Company; and NAHF Brockton Limited Partnership; or Safety Insurance?

7. Are you familiar with any of the individuals on either the United States' or the defendants' witness lists?

8. Are you familiar with any of the attorneys involved in this case?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ John A. Capin

JOHN A. CAPIN
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CERTIFICATE OF SERVICE

I, John A. Capin, Assistant U.S. Attorney, do hereby certify that I have, on November 16, 2007, caused a true and accurate copy of the foregoing to be served upon all counsel of record by filing the document with the Court electronically.

/s/ John A. Capin

JOHN A. CAPIN
Assistant U.S. Attorney